

Gulco Draft Removal Action Workplan dated 5/29/08

Comments:

1. (Page D-2, Sampling and Analysis Plan; and Page D-7, Waste Management Plan): A statement should be added that the materials will be disposed of at a facility that is in compliance with the EPA's Off-Site Rule.
2. (Same page & other locations): The water within the containment berm may contain materials that have leaked out from the tanks, in addition to the rainwater. The term "rainwater" should be changed to "water".
3. (Page D-7, Waste Management Plan): A statement should be added that all offsite transportation and disposal will be done in accordance with applicable U.S. Department of Transportation (USDOT) requirements.
4. (Page D-8, Health and Safety Plan): Add the following regarding the health and safety plan:

All requirements under the Occupational Safety and Health Act (OSHA) of 1970, 29 U.S.C. § 651 et seq., and under the laws of the State approved under Section 18 of the Federal OSHA laws, as well as other applicable safety and health requirements, will be followed. Federal OSHA requirements include Hazardous Materials Operation, 20 CFR § 1910, as amended by 54 Fed. Reg. 9317 (March, 1989), all OSHA General Industry (29 CFR § 1910) and Construction (29 CFR § 1926) standards wherever they are applicable, as well as OSHA record keeping and reporting regulations, and the EPA regulations set forth in 40 CFR § 300, relating to the conduct of work at Superfund sites.

5. (Page D-9, Schedule): The removal schedule should conform with the overall schedule for the site work being prepared now such that the final report is completed at some point prior to preparation of the draft Record of Decision.
6. (Page D-9, Removal Action Activities, Task 1): The plan should include a description of how the water will be evaluated and managed.